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11 Attorneys for Defendant
GOOGLE INC.

12 UNITED STATES DISTRICT COURT
13 NORTHERN DISTRICT OF CALIFORNIA
14 SAN FRANCISCO DIVISION

15 ORACLE AMERICA, INC.,
16 Plaintiffs,
17 v.
18 GOOGLE INC.,
19 Defendant.

Case No. 3:10-cv-03561 WHA

**DECLARATION OF RENNY HWANG IN
SUPPORT OF GOOGLE'S
ADMINISTRATIVE MOTION TO SEAL
DECLARATION OF CHRISTA M.
ANDERSON IN RESPONSE TO AUGUST
18, 2016 ORDER (ECF 2036)**

Dept. Courtroom 8, 19th Fl.
21 Judge: Hon. William Alsup

1 I, RENNY HWANG, declare as follows:

2 1. I am an attorney employed by Google Inc. ("Google"), where I have served as
3 senior litigation counsel for the last six years. My job responsibilities include, but are not limited
4 to, supervising our outside counsel in connection with litigation matters (such as this one), as well
5 as familiarizing myself with the areas of Google's businesses and documentation concerning
6 those businesses as they relate to litigation matters under my supervision. I submit this
7 declaration in support of Google's Administrative Motion to Seal the Declaration of Christa M.
8 Anderson in Response to August 18, 2016 Order ("Anderson Declaration"). I have knowledge of
9 the facts set forth herein, and if called upon as a witness, I could testify to them competently
10 under oath.

11 2. I have reviewed the Anderson Declaration and the exhibits attached to the
12 Declaration. Exhibits 3, 5-14 and the following portions of the Anderson Declaration and Exhibit
13 4 contain highly sensitive and confidential information regarding Google's internal business
14 strategy and on-going product development plans:

- 15 • Anderson Declaration: 4:1-5, 6-9, 10-11, 24-28; 5:1-2, 5-7, 10-13; 6:1-6,
16 6:28; 7:1-2; 10:3-6; 16:14-17:4; 17:6-8; 18:13-14; 18:16-20.
- 17 • Exhibit 4 (December 14, 2016 Lin Deposition Testimony): 13:25-15:18;
18 16:1-19:1; 20:1-22; 107:4-109:9; 115:1-16.

19 Google keeps the information identified confidential and public disclosure of this
20 information would provide a competitive advantage to Google's competitors and could have
21 negative effects on Google's business. In particular, public disclosure of on-going product
22 development information could allow competitors access to confidential information regarding
23 Google's ongoing business plans.

24 3. The above-listed portions of the Motion and Exhibits containing confidential
25 information related to Google's internal business strategy and product development should
26 therefore be sealed.

27 I declare under penalty of perjury under the laws of the State of California that the
28 foregoing is true and correct to the best of my knowledge.

Executed this 25th day of August, 2016 at Sunnyvale, California.

By:


RENNY HWANG